

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
VS.	:	CRIMINAL NO. 01-cr-05-04
	:	
GARY RAMSEY	:	

**MOTION FOR ORDER TO SEAL MOTION FOR SENTENCE REDUCTION
PURSUANT TO RULE 35**

Defendant Gary Ramsey, by his counsel, Carina Laguzzi, Esquire, respectfully moves this Court to seal his Motion for Sentence Reduction Pursuant to Rule 35, and in support thereof avers as follows:

1. The Defendant has filed a motion seeking a sentence reduction pursuant to Rule 35(b)(2)(B).
2. In support of his arguments, the Defendant has filed exhibits accompanying the above-referenced motion.
3. Exhibits “A” and “B” contain sensitive information about the Defendant.
4. Exhibit “C” is a portion of his medical record.
5. Due to the sensitive and personal nature of these records, Counsel is requesting both the Motion for Reduction in Sentence and the attached Exhibits be filed under seal.

WHEREFORE, for the reasons contained herein and such additional reasons as may become apparent at a hearing on this matter, the Defendant requests this

Court to grant an Order to Seal the Motion for Sentence Reduction Pursuant to Rule 35 and the accompanying exhibits to same.

Respectfully submitted,

/s/ Carina Laguzzi

Carina Laguzzi, Esquire
Counsel for Defendant Ramsey

Dated: September 3, 2020